

Paul J. Pascuzzi, State Bar No. 148810
Jason E. Rios, State Bar No. 190086
Thomas R. Phinney, State Bar No. 159435
Mikayla E. Kutsuris, State Bar No. 339777
FELDERSTEIN FITZGERALD
WILLOUGHBY PASCUZZI & RIOS LLP
500 Capitol Mall, Suite 2250
Sacramento, CA 95814
Telephone: (916) 329-7400
Facsimile: (916) 329-7435
Email: ppascuzzi@ffwplaw.com
jrios@ffwplaw.com
tphinney@ffwplaw.com
mkutsuris@ffwplaw.com

Ori Katz, State Bar No. 209561
Alan H. Martin, State Bar No. 132301
SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
A Limited Liability Partnership
Including Professional Corporations
Four Embarcadero Center, 17th Floor
San Francisco, California 94111-4109
Telephone: (415) 434-9100
Facsimile: (415) 434-3947
Email: okatz@sheppardmullin.com
amartin@sheppardmullin.com

Attorneys for The Roman Catholic Archbishop of San Francisco

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re	Case No. 23-30564
THE ROMAN CATHOLIC ARCHBISHOP	Chapter 11
OF SAN FRANCISCO,	[No Hearing Requested]
Debtor and	
Debtor in Possession.	

STIPULATED STANDBY AGREEMENT [11 U.S.C § 1121(d)]

1 This standstill agreement (the “Standstill Agreement”) is made and entered into by and
2 among The Roman Catholic Archbishop of San Francisco, the debtor and debtor in possession (the
3 “RCASF” or the “Debtor”) and the Official Committee of Unsecured Creditors (the “Committee”).

4 **I. RECITALS**

5 WHEREAS, pursuant to section 1121(d) of title 11 of the United States Code, the period
6 during which the Debtor has the exclusive right to file a chapter 11 plan will expire on February 20,
7 2025.

8 NOW THEREFORE, THE PARTIES, BY AND THROUGH THEIR RESPECTIVE
9 UNDERSIGNED COUNSEL, HEREBY STIPULATE AND AGREE AS FOLLOWS:

10 1. The “Standstill Period” is a period starting on February 20, 2025, and ending on the
11 earlier of August 20, 2025, or 45 days after the date the Debtor or the Committee send a notice of
12 termination by email to the other party to this Standstill Agreement.

13 2. The Debtor and the Committee shall not file or solicit a plan of reorganization during
14 the Standstill Period.

15 3. This Standstill Agreement shall be binding on the Debtor, the Committee, and their
16 undersigned counsel, as applicable.

17 4. This Standstill Agreement shall become effective upon execution by counsel for the
18 Debtor and counsel for the Committee; provided however, that notwithstanding Bankruptcy Rule
19 6004(h), any order approving this stipulation shall be immediately effective and enforceable upon
20 its entry.

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1 5. This Court shall retain jurisdiction to hear and determine all matters arising from or
2 relating to the implementation, interpretation, and/or enforcement of this Standstill Agreement.

3 ***STIPULATED AND AGREED TO BY:***

4 Dated: February 18, 2025

FELDERSTEIN FITZGERALD
WILLOUGHBY PASCUZZI & RIOS LLP

5 By /s/ Paul J. Pascuzzi

6 Paul J. Pascuzzi

7 Attorneys for Debtor and Debtor in Possession
The Roman Catholic Archbishop of San Francisco

8 Dated: February 18, 2025

PACHULSKI STANG ZIEHL & JONES LLP

9 By /s/ Brittany M. Michael

10 Brittany M. Michael

11 Counsel for the Official Committee of Unsecured
12 Creditors

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